

Message

From: Donovan, Betsy [Donovan.Betsy@epa.gov]
Sent: 4/27/2018 8:09:51 PM
To: Griffiths, Rachel [griffiths.rachel@epa.gov]; Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]; Kaur, Supinderjit [Kaur.Supinderjit@epa.gov]
CC: Fajardo, Juan [Fajardo.Juan@epa.gov]
Subject: RE: Rolling Knolls FS - revised Groundwater Alternatives

Sounds good! Thanks

From: Griffiths, Rachel
Sent: Friday, April 27, 2018 4:01 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Cc: Fajardo, Juan <Fajardo.Juan@epa.gov>
Subject: RE: Rolling Knolls FS - revised Groundwater Alternatives

Some details are included in the FS already, but the path forward isn't explicitly set out. I think something like this should cover it:

Groundwater will be monitored for 5 years following completion of any soil and source area remediation, and at that point (and along the way) data will be evaluated to determine if COCs are stable or decreasing in magnitude in aerial extent. An estimated time until compliance should be calculated to determine if the ARARs will be met within a reasonable timeline (30 yrs?). If it is determined that COCs are migrating, increasing in concentration, or will not meet ARARs in a reasonable timeframe, the contingency will be triggered.

-Rachel

From: Donovan, Betsy
Sent: Friday, April 27, 2018 3:49 PM
To: Griffiths, Rachel <griffiths.rachel@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Cc: Fajardo, Juan <Fajardo.Juan@epa.gov>
Subject: RE: Rolling Knolls FS - revised Groundwater Alternatives

Thanks Rachel! What specific performance monitoring and trigger details would be necessary? I think if they are needed for the ROD, they should be in the FS and we should mention them in our comments.

From: Griffiths, Rachel
Sent: Friday, April 27, 2018 3:17 PM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Cc: Fajardo, Juan <Fajardo.Juan@epa.gov>
Subject: RE: Rolling Knolls FS - revised Groundwater Alternatives

Hi all,

I attached some comments on Section 7. Overall I'm very pleased with how the alternatives were presented as compared to the first draft – the structure of the contingency will allow for the flexibility to choose an appropriate technology when more data has been collected. My comments mostly focus on Alternative 3, source control/ICs/monitoring with contingency.

I don't know if a more detailed contingency trigger is required for the FS, but there's no way our management/HQ would approve a ROD without specific performance monitoring and trigger details. A monitoring plan, likely including a more robust monitoring network will need to be submitted and approved. There will be a combination of many lines of evidence for performance monitoring including some of the options listed on pg 11 (concentration/time plots, Mann-Kendall analysis, etc) but evaluations of time until compliance will be an important factor that wasn't mentioned in the FS (the contingency should be triggered if the time until compliance is >30 years or something along those lines).

The section is written in a way that makes it seem that 1,4-dioxane and benzene are the only groundwater COCs. This is incorrect, and the first draft of the FS included a comprehensive list of GW COCs. I made a comment to this effect.

Please let me know if you have any questions or would like more details in any comments!

-Rachel

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From: Vaughn, Stephanie

Sent: Wednesday, April 18, 2018 4:54 PM

To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Griffiths, Rachel <griffiths.rachel@epa.gov>

Cc: Fajardo, Juan <Fajardo.Juan@epa.gov>

Subject: FW: Rolling Knolls FS - revised Groundwater Alternatives

Took a very quick look at this and think it's generally okay – I'm sure we'll have some specific comments, but I don't see any big-picture problems with how they laid this out.

Would you all agree, or am I missing something?

Rachel – the part that concerns me the most is the performance measures for Alt. 3. In particular, see Page 11 (which I think is the only place they are really mentioned).

Thanks!

From: John Persico [<mailto:JPersico@Geosyntec.com>]

Sent: Wednesday, April 18, 2018 4:37 PM

To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>

Cc: Seth Kellogg <SKellogg@Geosyntec.com>; Julia Ryan <Julia.Ryan@Geosyntec.com>; Michael Draikiwicz <mdraikiwicz@enviro-sciences.com>; Fisher, Gary (Nokia - US/Murray Hill) <gary.fisher@nokia.com>; Richard Ricci <r Ricci@lowenstein.com>; Truedinger, Robb <robb.truedinger@novartis.com>; alalonde@riker.com; Freilich, Irvin M. <IFreilich@gibbonslaw.com>; Bergeron, Brian P <pete.bergeron@chevron.com>; 'Richard T. Hughes' <rhughes@jw.com>; Goldfarb, Steven <steven.goldfarb@novartis.com>; 'Shawn LaTourette' <SLaTourette@gibbonslaw.com>; Mirza-Reid, Sofina <sofina.mirza-reid@novartis.com>; mfaigen@issuesllc.com; Gabala, Allison <AGabala@lowenstein.com>

Subject: Rolling Knolls FS - revised Groundwater Alternatives

Betsy, Supinder, and Stephanie, the revised text for the Groundwater Alternatives (Section 7) of the draft Feasibility Study for Rolling Knolls is attached for your review. Let us know when you want to discuss.

John L. Persico, P.G.
Principal
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